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June 5, 1995

Our File: 04990/002001

BY HAND DELIVERY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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JUN 5 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

ET Docket No. 95-19
Comments of Sun Microsystems, Inc.

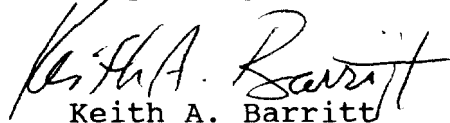
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Dear Mr. Caton:

On behalf of our client Sun Microsystems, Inc. ("Sun"), enclosed is an original and five copies of Sun's comments in the above-referenced proceeding.

Please contact the undersigned with any questions regarding this matter.

Very truly yours,


Keith A. Barritt

Enclosures

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List A B C D E

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JUN 5 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

May 31, 1995



Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M Street N.W. Room 222
Washington, DC 20554

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Dear Mr. Caton:

Thank you for the opportunity to comment on the February 7, 1995 Notice of Proposed Rule Making, ET Docket No. 95-19.

Sun Microsystems Computer Company (SMCC) welcomes the worldwide trend towards manufacturer's declaration of conformity to EMC standards. It is a tremendous benefit to global manufacturers when national standards and requirements are harmonized such that a single test is accepted worldwide. One example in that direction is the European Union which has allowed computer manufacturers to design, test and declare that their products are in conformance to EN55022 and will be accepted in all 15 countries. The savings in both cost and time-to-market is substantial and crucial to continued success in the marketplace.

COMMENTS BY PARAGRAPH

1. SMCC agrees with the manufacturer's declaration of conformity proposal; however we would like the Commission to clarify that Class A devices tested to the Class B limits may continue to be "authorized" under the current verification procedures and labelled as Class B compliant. For the purposes of EMC emissions, the main difference between personal computers (PC's), workstations, servers, minicomputers and mainframes is the size of the enclosure. They all contain one or more CPU chips, memory, disk drives and power supplies. If a manufacturer should decide to design, test and build a product to meet the Class B limits even though it is considered to be a Class A product, they should be encouraged, not discouraged in that endeavor. Accordingly, verification to the Class B limits should be permitted for Class A devices. Furthermore, whatever logo is adopted by the Commission to signify Class B compliance PC's also should be permitted for Class A devices verified to these limits.

7. A simplified FCC logo on the product label and maintaining the current references to FCC compliance in the user's manual should be sufficient.

8. There is no need to complicate the testing process with additional National Voluntary Laboratory Accreditation Program (NVLAP) accreditation. The computer industry has already shown, as stated in Paragraph 5, that we are currently in a high rate of conformance as demonstrated by the lack of significant interference caused by computers. Further, the European Union has not required laboratory accreditation as part of their EMC Directive and every effort should be made to harmonize the FCC and EU rules. Since the manufacturer is legally responsible for equipment compliance, we already have the burden of testing in such a manner as to assure that our products meet worldwide EMC rules and regulations. Since we are meeting that responsibility, we see no need to impose additional and oppressive requirements.

9. NVLAP accreditation is not considered desirable or necessary.

12. In the European Union, manufacturers are permitted to self-declare compliance to their EMC Directive for all computer equipment, not just PCs and PC peripherals. It should be clarified that the FCC will also permit self-declaration for all computer equipment.

13. It is suggested that the FCC maintain the same limits for product EMC emissions but allow the simplified manufacturers self-declaration of conformity. Increased audits and a watchful eye on the number of field problems will ensure that the industry continues to comply with your EMC emissions standards.

14. The computer industry is indeed moving towards a build-to-order manufacturing process in an attempt to satisfy customer expectation and reduce inventory of finished goods. Allowing manufacturers to declare that the typical or maximum configuration meets all of the FCC EMC emissions standards should be sufficient without being overburdening.

19. This paragraph perfectly describes the problem faced by most computer manufacturers today. We are encouraged that the FCC is aware of the problem and is also willing to work with the computer industry to create the best possible solution.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis P. Symanski", with a stylized flourish at the end.

Dennis P. Symanski

*Manager, Compliance Engineering
Sun Microsystems Computer Co.*